



Via Electronic Mail and UPS

July 26, 2016

David Turin
U.S. Environmental Protection Agency
5 Post Office Square – Suite 100
Mail Code: OES04-3
Boston, MA 02109-3912

Re: Hull WWTF Unauthorized Discharge Summary
Town of Hull, MA Administrative Order on Consent, Docket No. CWA-01-AO-16-09

Dear Mr. Turin:

In advance of the July 31, 2016 due date identified in the Administrative Order on Consent (AOC), Woodard & Curran, on behalf of the Town of Hull is hereby submitting a *Draft Unauthorized Discharge Summary* for your review, comment and/or approval. Woodard & Curran began operation and maintenance of the Hull Wastewater Treatment Facility (WWTF) on April 1, 2015. In accordance with the AOC requirements, unauthorized discharge data from January 1, 2013 through December 31, 2015 was summarized using available Town of Hull and WWTF information.

Currently, the Town of Hull stormwater catch basins are not numbered, but are mapped on the Town's GIS System. Therefore, if an unauthorized discharge reached a catch basin, it was identified by location as opposed to asset number. Your timely response and comments are appreciated to ensure swift integration and implementation. Thank you in advance and feel free to reach out with any questions or concerns.

Sincerely,

WOODARD & CURRAN

Frank Cavaleri

Frank Cavaleri
Senior Area Manager

FJC/klr



Attachments:

1. Unauthorized Discharge Summary Table
2. Figures
 - a. SSO Events 2013- 2015
 - b. 2013 SSO Events
 - c. 2014 SSO Events
 - d. 2015 SSO Events

cc: David Burns, MassDEP Southeast Regional Office
Philip Lemnios, Town Manager, Town of Hull
James Dow, Director, Department of Public Works, Town of Hull
Carol O'Connor, Sewer Department, Town of Hull
Kate Roosa, W&C

PN: 217319.00



ATTACHMENT 1: UNAUTHORIZED DISCHARGE SUMMARY TABLE

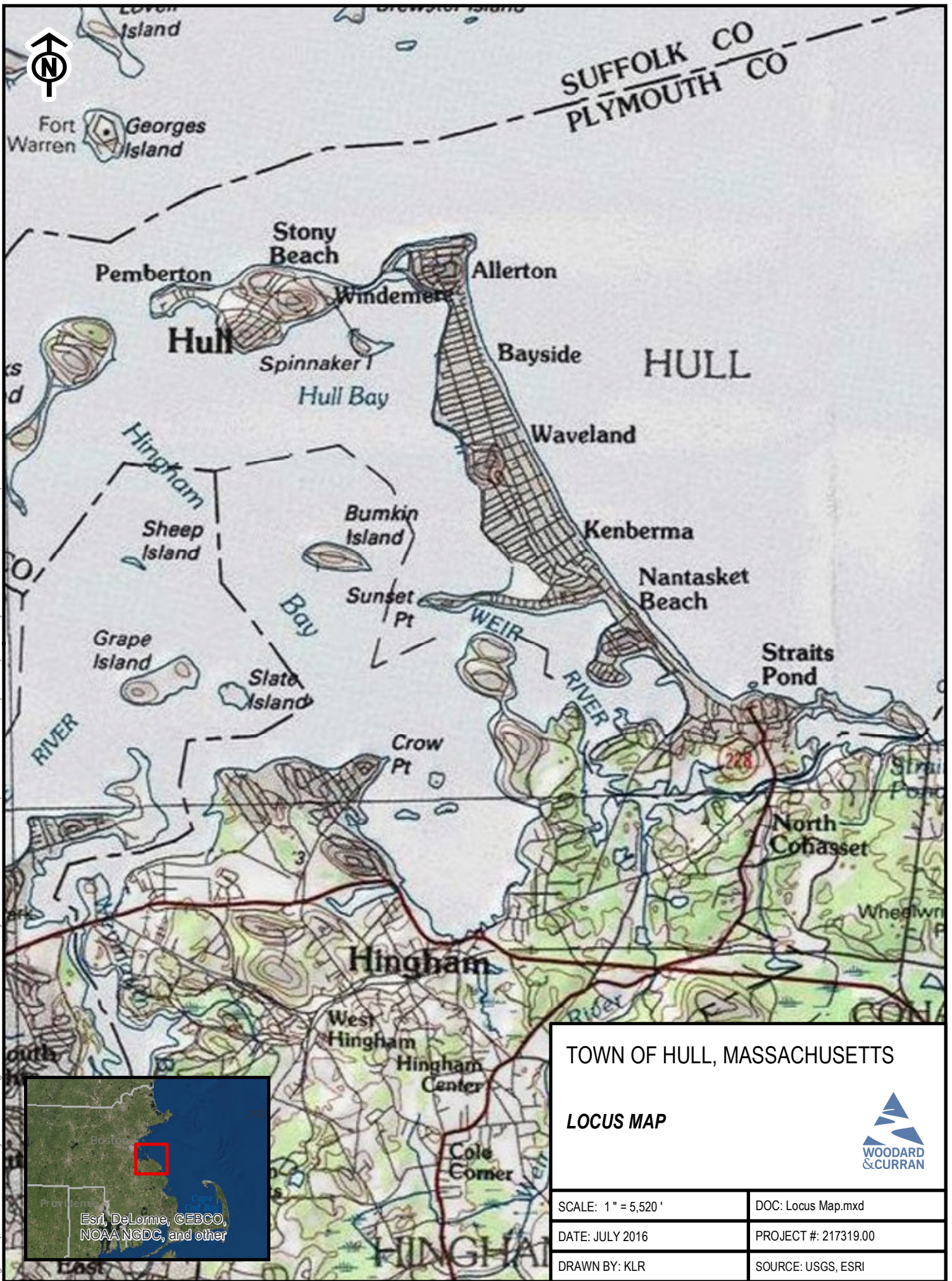
Date	a. Type of Asset which the unauthorized discharge occurred from	b. Location	c. Cause of unauthorized discharge	d. If caused by a blockage, identify	e. If caused by mech, elec, or struc. Failure, the date of last inspection, maintenance, or repair of failed asset	f. Begin Date & Time	g. Stop Date & Time	h. Notification Source	i. Estiamated Gallons Released	j. Method used to estimate volume	k. Did the release reach any portion of the Town's MS4	l. Did the release reach a wetland or surface water? If so, include the name and exact location where?	m. Measures taken to min. the vol. and duration of the unauthorized discharge	n. Measures taken to clean the area where the unauthorized discharge occurred	o. Corrective actions taken to prevent reoccurance of unauthorized discharges at the same location	p. Date of the last unauthorized discharge in the same general location	If the release occurred in the ground, provide the location of the nearest down-gradient catch basin and the name of the receiving water to which the batch basin discharges
2/28/2013	WWTP	1111 Nantasket Ave (WWTP) N 42 degrees 18.348' W 070 degrees 53.987	Snowmelt, high groundwater, mechanical failure	n/a	2/28/2013	2/28/2013, 3:45 AM	3/2/2013, 10:55 PM	On-site staff (Dan Calnen)	11,500,000	flow totalizer plus temporary pump capacities	Yes	Yes, Hull Bay Boston Harbor	Portable generators, portable pumps	n/a	Replaced valves, repaired pumps & shafts	N/A	In WWTP driveway Hull Bay
3/3/2013	Hose	1111 Nantasket Ave (WWTP) N 42 degrees 18.348' W 070 degrees 53.987	Leak at hose coupling	n/a	n/a	3/3/2013, 11:45 AM	3/3/2013, 11:55 AM	On-site staff (Pete Nyberg)	50	Visual	Yes	No	Stopped pump	Washed down area	Replaced coupling on hose	2/28/2013	In WWTP driveway Hull Bay
3/3/2013	Temporary influent pump discharge hose	1111 Nantasket Ave (WWTP) N 42 degrees 18.348' W 070 degrees 53.987	Leak at influent backup pump discharge line connection	n/a	n/a	3/3/2013, 10:00 PM	3/3/2013, 10:05 PM	On-site staff (Michael Burke)	10	Visual	No	No	Stopped pump	n/a	Replaced pipe "O" ring, reinforced pipe connection, tested under pressure	2/28/2013	In WWTP driveway Hull Bay
3/3/2013	Temporary effluent pump discharge hose	1111 Nantasket Ave (WWTP) N 42 degrees 18.348' W 070 degrees 53.987	Leak at effluent backup pump discharge line connection	n/a	n/a	3/3/2013, 10:30 PM	3/3/2013, 10:35 PM	On-site staff (Michael Burke)	100	Visual	No	No	Stopped pump	n/a	Replaced broken discharge pipe	2/28/2013	In WWTP driveway Hull Bay
3/4/2013	Discharge line	1111 Nantasket Ave (WWTP) N 42 degrees 18.348' W 070 degrees 53.987	Leak at hose coupling	n/a	n/a	3/4/2013, 7:10 AM	3/4/2013, 7:15 AM	On-site staff (Thomas Azevedo)	5	Visual	No	No	Stopped pump	Cleaned area	Re-attached coupling and strapped coupling in place	3/3/2013	In WWTP driveway Hull Bay
3/8/2013	Discharge line	1111 Nantasket Ave (WWTP) N 42 degrees 18.348' W 070 degrees 53.987	Leak at temporary secondary effluent hose coupling	n/a	n/a	3/8/2013, 1:28 PM	3/8/2013, 1:35 PM	On-site staff (John Marcin)	138	Visual	No	No	Stopped pump	Washed down driveway	Re-attached coupling and strapped coupling in place	3/4/2013	In WWTP driveway Hull Bay
3/11/2013	Discharge line for temporary secondary effluent pump	1111 Nantasket Ave (WWTP) N 42 degrees 18.348' W 070 degrees 53.987	Leak from coupling	n/a	n/a	3/11/2013, 1:28 PM	3/11/2013, 1:35 PM	On-site staff (Jim Nyberg)	240	Visual	Yes	No	Stopped pump	Washed down driveway	Hose coupling re-attached and strapped in place	3/8/2013	In WWTP driveway Hull Bay
3/19/2013	Suction line	1111 Nantasket Ave (WWTP) N 42 degrees 18.348' W 070 degrees 53.987	Leak while changing suction line	n/a	n/a	3/19/2013, 9:50 PM	3/19/2013, 10:05 PM	On-site staff (Kevin Lukasiewicz)	10	Visual	No	No	n/a	n/a		3/11/2013	In WWTP driveway Hull Bay
3/20/2013	Temporary influent pump discharge line	1111 Nantasket Ave (WWTP) N 42 degrees 18.348' W 070 degrees 53.987	Leak from coupling	n/a	n/a	3/20/2013, 9:50 PM	3/20/2013, 10:05 PM	On-site staff (Jason O'Brien)	83	Visual	No	No	Stopped pump	n/a	Re-attached coupling, strapped down coupling in place	3/19/2013	In WWTP driveway Hull Bay
4/1/2013	Temporary effluent piping	1111 Nantasket Ave (WWTP) N 42 degrees 18.348' W 070 degrees 53.987	Leak occurred during pipe disconnection for removal	n/a	n/a	4/1/2013, 3:50 PM	4/1/2013, 4:00 PM	On-site staff (John Marcin)	50	Visual	No	No	n/a	n/a	n/a	3/20/2013	In WWTP driveway Hull Bay
4/5/2013	Sludge truck valve	1111 Nantasket Ave (WWTP) N 42 degrees 18.348' W 070 degrees 53.987	Human error	n/a	n/a	4/5/2013, 6:30 AM	4/5/2013, 6:32 AM	On-site staff (Rick Sutton)	1	Visual	No	No	n/a	n/a	New SOP for sludge truck loading	4/1/2013	In WWTP driveway Hull Bay
4/22/2013	Temporary influent pump hose	1111 Nantasket Ave (WWTP) N 42 degrees 18.348' W 070 degrees 53.987	Mechanical	n/a	n/a	4/22/2013, 11:00 AM	4/22/2013, 11:10 AM	On-site staff (John Marcin)	500	Visual	No	No	Pump stopped	n/a	Reconnected hose, strapped hose to influent pump	4/5/2013	In WWTP driveway Hull Bay
5/22/2013	Temporary influent pump hose	1111 Nantasket Ave (WWTP) N 42 degrees 18.348' W 070 degrees 53.987	Mechanical	n/a	n/a	5/22/2013, 11:00 AM	5/22/2013, 1:00 PM	On-site staff (John Marcin)	400 (200 inf/200 eff)	Visual	No	No	n/a	n/a	None, spill occurred while dismantling temporary piping	4/22/2013	In WWTP driveway Hull Bay
5/25/2013	Primary clarifier splitter box	1111 Nantasket Ave (WWTP) N 42 degrees 18.348' W 070 degrees 53.987	Mechanical	n/a	n/a	5/25/2013, 8:15 PM	5/25/2013, 8:25 PM	On-site staff (Eric Sutton)	500	Visual	Yes	No	n/a	Raked the area	n/a	5/22/2013	In WWTP driveway Hull Bay
6/8/2013	WWTP Grit Chamber	1111 Nantasket Ave (WWTP) N 42 degrees 18.348' W 070 degrees 53.987	Mechanical	n/a	n/a	6/8/2013, 2:30 AM	6/8/2013, 2:50 AM	On-site staff (Chuck Antoine)	unknown	n/a	No	No	n/a	n/a	n/a	5/25/2013	n/a

Date	a. Type of Asset which the unauthorized discharge occurred from	b. Location	c. Cause of unauthorized discharge	d. If caused by a blockage, identify	e. If caused by mech, elec, or struc. Failure, the date of last inspection, maintenance, or repair of failed asset	f. Begin Date & Time	g. Stop Date & Time	h. Notification Source	i. Estiamated Gallons Released	j. Method used to estimate volume	k. Did the release reach any portion of the Town's MS4	l. Did the release reach a wetland or surface water? If so, include the name and exact location where?	m. Measures taken to min. the vol. and duration of the unauthorized discharge	n. Measures taken to clean the area where the unauthorized discharge occurred	o. Corrective actions taken to prevent reoccurrence of unauthorized discharges at the same location	p. Date of the last unauthorized discharge in the same general location	If the release occurred in the ground, provide the location of the nearest down-gradient catch basin and the name of the receiving water to which the batch basin discharges
1/23/2014	Sludge transfer hose	1111 Nantasket Ave (WWTP) N 42 degrees 18.348' W 070 degrees 53.987	Human error - truck driver turned on transfer pump before connection was made	n/a	n/a	1/23/2014, 1:15 PM	1/23/2014, 1:16 PM	On-site staff (Chuck Antoine)	1,600	Based on amount in vactor after cleanup	No	No	Shut down pump	Washed down area after vactor cleaned up	Lockout/tagout, new SOP for truck transfer	6/8/2013	In WWTP driveway Hull Bay
2/13/2014	Station 4 force main	12 Marginal Rd (Sewer station #4) N 42 degrees 16.308' W 070 degrees 51.991'	Broken force main	n/a	n/a	2/13/2014, 10:00 PM	2/14/2014, 1:30 AM	On-site staff (Chuck Antoine)	55,000	Estimate based on station flow	No	No	Shut down pump	Washed down area after vactor cleaned up	Lockout/tagout, new SOP for truck transfer	n/a	In WWTP driveway Hull Bay
3/30/2014	Manhole	13 Rockland Circle (coordinates not available)	Rain event	n/a	n/a	3/30/2014, 3:00 PM	3/30/2014, 5:49 PM	Hull Police	8,500	Visual	No	Yes, Wetlands between G.W. Blvd and Rockland Circle	Portable pumps at station, trucks to haul	No	Station pumps removed and repaired	n/a	Rockland Circle Hull Bay
4/1/2014	Backup into property	67 Highland Ave (coordinates not available)	Blockage	Debris in main	n/a	4/1/2014, 5:15 PM	4/1/2014 17:30	Hull Police	3	Visual	No	No	Used jetter to clear the line	Resident cleaned up	n/a	n/a	Highland Ave Hull Bay
6/7/2014	Sludge holding tank	1111 Nantasket Ave (WWTP) N 42 degrees 18.348' W 070 degrees 53.987	Mechanical	n/a	n/a	6/7/2014, 8:30 AM	6/7/2014, 8:35 AM	On-site staff (Joe Basler)	750	Pump capacity (150 gpm) X spill time (5 min)	No	No	Stopped pumping	Vactored up spill, spread line	Replaced level probe inside holding tank	1/23/2014	n/a
Woodard & Curran Began Operating Facility, 4/1/15																	
5/1/2015	Sludge hose used for hook-up to Truck	1111 Nantasket Ave (WWTP) N 42 degrees 18.348' W 070 degrees 53.987'	Improper procedure while hooking up sludge truck	N/A	n/a	5/1/2015, 6:30 AM	5/1/15, 6:33 AM	On-Site Staff	90	Visual	No	No				6/8/2013	In WWTP driveway Hull Bay
6/10/2015	Clay sewer main	14 Vautrinot Ave N 42 degrees 18.132' W 070 degrees 54.484'	Blockage	Stray brick in pipe	n/a	6/10/2015, 10:49 AM	6/10/2015, 4:00 PM	Hull DPW (Jim Dow)	30	Visual	No	No	Hired a vactor/jetter to clear the line	Area excavated and clean fill provided	n/a	n/a	Vautrinot Ave @ Main St Hull Bay
6/21/2015	Manhole	11 Highland Ave N 42 degrees 18.106' W 070 degrees 54.450'	Blockage	Rags, grease, brick fragments in manhole	n/a	6/21/2015, 8:00 PM	6/21/2015, 11:40 PM	Hull Police	345	Visual	No	No	Used jetter to clear the line	n/a (heavy rain at 10 pm)	n/a	n/a	Highland Ave @ Main St Hull Bay
7/2/2015	Manhole	9 Highland Ave N 42 degrees 18.118' W 070 degrees 54.435'	Blockage	Collapsed pipe	n/a	7/2/2015, 7:30 AM	7/3/2015, 10:00 AM (repaired)	Hull Police	20	Visual	No	No	Used jetter to clear the line	Excavated area, clean fill used	n/a	n/a	Highland Ave @ Main St Hull Bay
7/16/2015	Bypass pump	165 Main St (Sewer station #9) N 42 degrees 18.266' W 070 degrees 55.130'	Mechanical	n/a	n/a	7/16/2015, 3:30 PM	7/16/2015, 3:31 PM	On-site staff (Rick Sutton)	20	Visual	No	No	Stopped pumping	Liquid evaporated on surface	Set-up new SOP for setting up temporary bypass pumping	n/a	Main St Hull Bay
7/31/2015	Gravity thickener blend box	1111 Nantasket Ave (WWTP) N 42 degrees 18.348' W 070 degrees 53.987'	Blockage	Sludge	n/a	7/31/2015, 7:30 AM	7/31/2015, 7:35 AM	On-site staff	750	Based on liquid that went into offline tank	No	No	Stopped Pumping	Pumped sludge, washed down area, raked grass applied lime	Cleaned out clogged inlet, evaluate installation of shut-off float	5/1/2015	WWTP driveway Hull Bay
8/17/2015	Sludge truck	1111 Nantasket Ave (WWTP) N 42 degrees 18.348' W 070 degrees 53.987'	Human error	n/a	n/a	8/17/2015, 8:00 AM	8/17/2015, 8:00 AM	On-site staff (John Currier)	50	Visual	No	No	Stopped Pumping	Washed down area, wet vacuumed driveway, sprayed area with diluted hypo solution	Reviewed truck loading SOP	7/31/2015	WWTP driveway Hull Bay
11/5/2015	Sewer main	245 Nantasket Ave N 42 degrees 16.328' W 070 degrees 51.523'	Gas company broke the sewer line, did a temporary repair to continue their work then notified us the following morning	n/a	n/a	11/5/2015, 6:00 PM	11/6/2015, 9:50 AM	National Grid gas company	unknown	n/a	No	unknown	n/a	Break occurred inside an excavation hole	Informed gas company to notify us immediately	n/a	n/a
11/25/2015	Bypass pipe connection	42 Valley Beach Ave N 42 degrees 16.074' W 070 degrees 50.758'	Mechanical	n/a	n/a	11/25/2015, 10:30 AM	11/25/2015, 10:30 AM	On-site staff (Aram Varjabedian)	15	Visual	No	No	Stopped pumping	None, water drained into open manhole	Reviewed SOP to update	n/a	Valley Beach Rd Nantasket Beach



ATTACHMENT 2: FIGURES

Figure Exported: 7/16/2016 By: kroosa Using: \\woodardcurran.net\shared\Projects\217319 Hull MA ConOps WW & Collection System\wip\GIS\Project Files\ArcDocs\Locus Map.mxd



TOWN OF HULL, MASSACHUSETTS

LOCUS MAP



SCALE: 1" = 5,520'

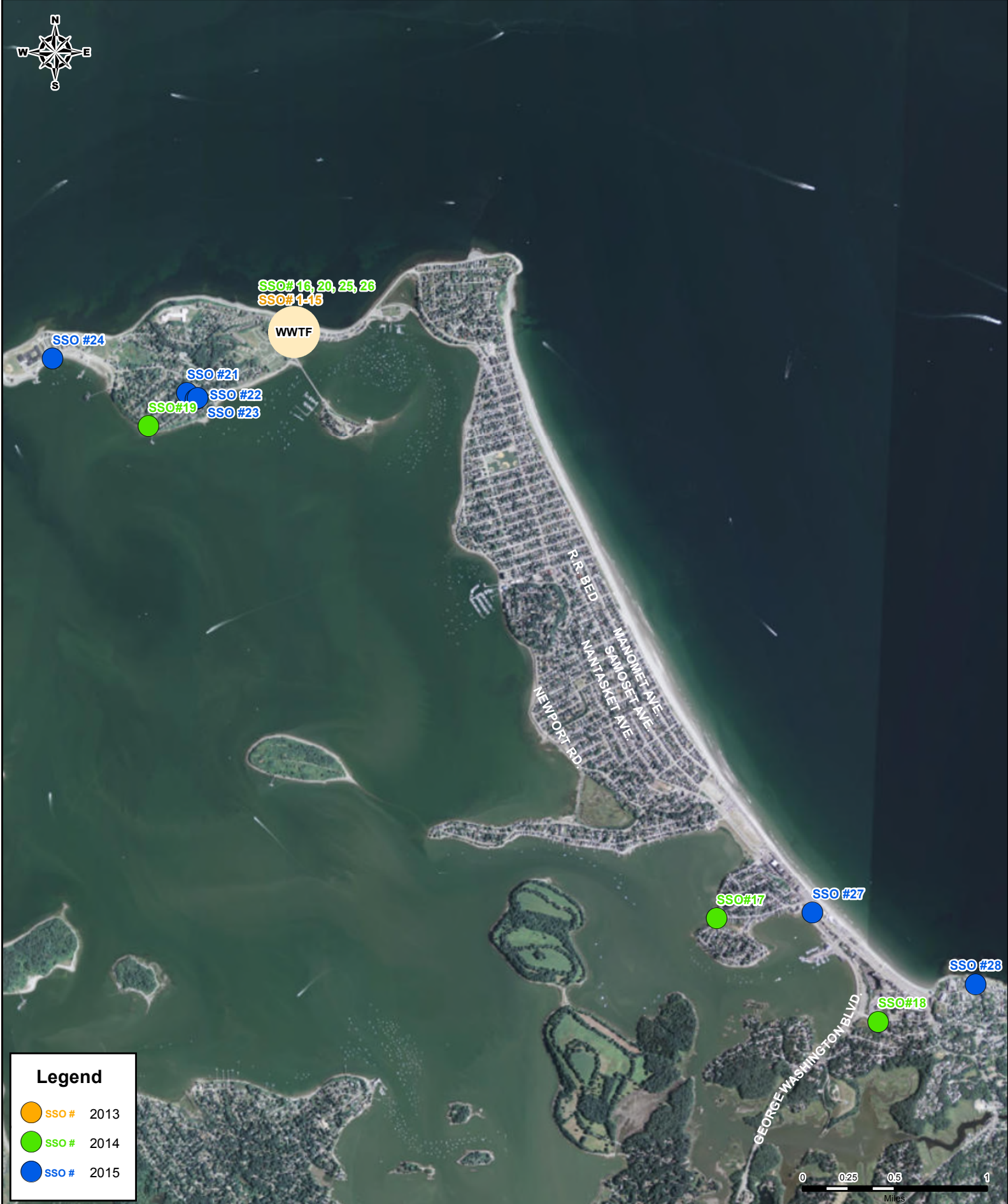
DOC: Locus Map.mxd

DATE: JULY 2016

PROJECT #: 217319.00

DRAWN BY: KLR

SOURCE: USGS, ESRI



Legend

- SSO # 2013
- SSO # 2014
- SSO # 2015

Hull Wastewater

Hull, MA

SSO Events 2013-2015

DRAWN BY: ADF

DOC: SSO Events 2013_2015.mxd



709 Westchester Avenue, Suite L2
White Plains, New York 10604
800.807.4080 | www.woodardcurran.com
COMMITMENT & INTEGRITY DRIVE RESULTS

SSO #	Discharged from asset	Cause of SSO	Estimated Gallons
1	WWTP	Snowmelt, high groundwater, mechanical failure	11,500,000
2	Hose	Leak at hose coupling	50
3	Temporary influent pump discharge hose	Leak at influent backup pump discharge line connection	10
4	Temporary effluent pump discharge hose	Leak at effluent backup pump discharge line connection	100
5	Discharge line	Leak at hose coupling	5
6	Discharge line	Leak at temporary secondary effluent hose coupling	138
7	Discharge line for temporary secondary effluent pump	Leak from coupling	240
8	Suction line	n/a	10
9	Temporary influent pump discharge line	Leak from coupling	83
10	Temporary effluent piping	Leak occurred during pipe disconnection for removal	50
11	Sludge truck valve	Human Error	1
12	Temporary influent pump hose	Blockage	500
13	Temporary influent pump hose	Mechanical	600
14	Primary clarifier splitter box	Mechanical	500
15	WWTP Grit Chamber	Mechanical	n/a



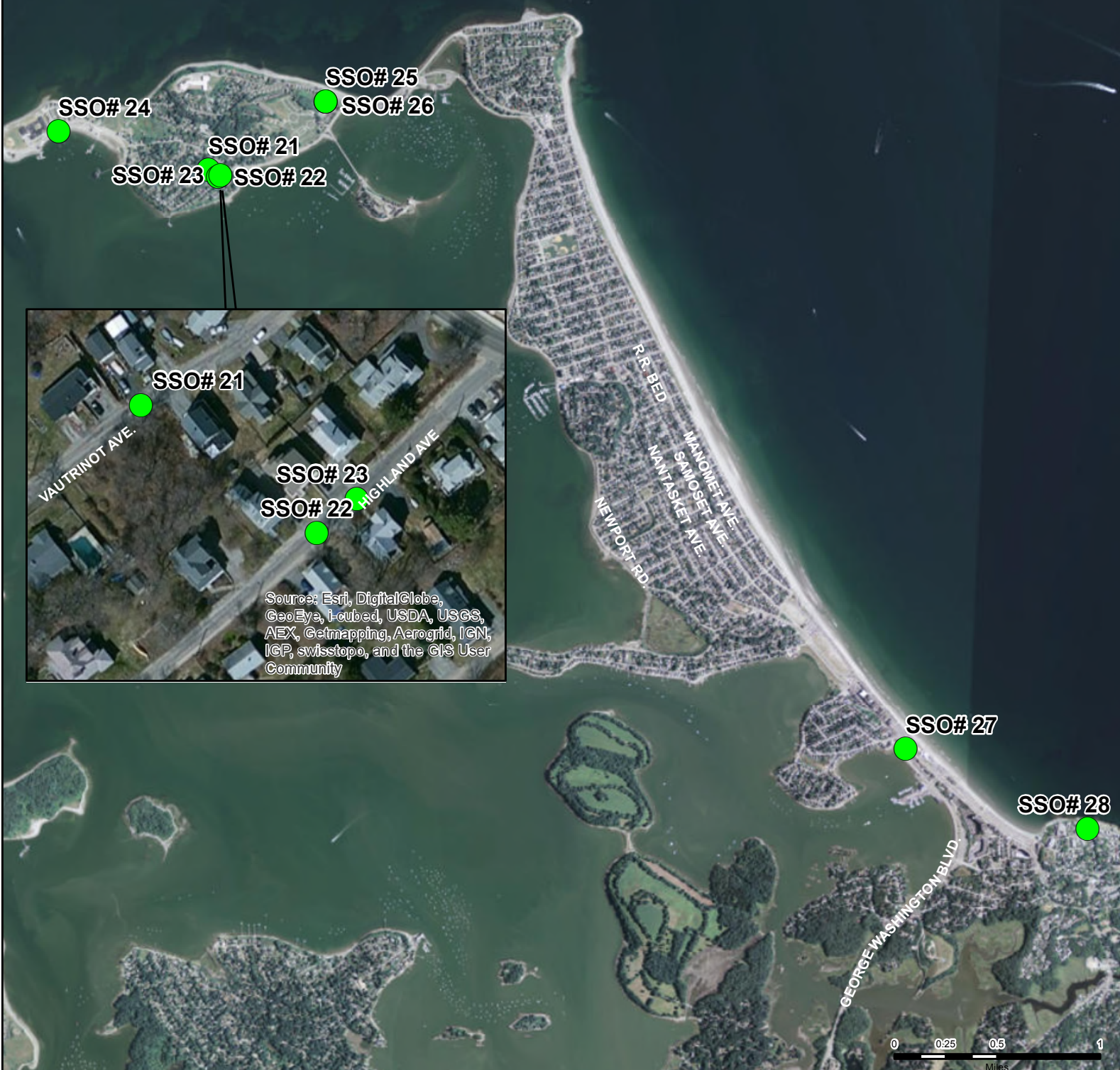


SSO #	Discharge From Asset	Cause of SSO	Estimated Gallons
16	Sludge transfer hose	Human error - truck driver turned on transfer pump before connection was made	1600
17	Station 4 force main	Broken force main	55000
18	Manhole	Rain event	8500
19	Backup into property	Blockage	3
20	Sludge holding tank	Mechanical	750





SSO #	Discharge From Asset	Cause of SSO	Estimated Gallons
21	Clay sewer main	Blockage	30
22	Manhole	Blockage	345
23	Manhole	Blockage	>20
24	Bypass pump	Mechanical	>20
25	Gravity thickener blend box	Blockage	750
26	Sludge truck	Human error	50
27	Sewer main	Gas company broke the sewer line, did a temporary repair to continue their work then	n/a
28	Bypass pipe connection	Mechanical	<15



Source: Esri, DigitalGlobe,
GeoEye, i-cubed, USDA, USGS,
AEX, Getmapping, Aerogrid, IGN,
ICP, swisstopo, and the GIS User
Community

Hull Wastewater

Hull, MA

2015 SSO Events

DRAWN BY: ADF

DOC: Hull_SSO_2015.mxd



709 Westchester Avenue, Suite L2
White Plains, New York 10604
800.807.4080 | www.woodardcurran.com
COMMITMENT & INTEGRITY DRIVE RESULTS